

EXHIBIT “A”

Court of Common Pleas of Philadelphia County
Trial Division

Civil Cover Sheet

		For Prothonotary Use Only (Docket Number)		
		OCTOBER 2022		
		E-Filing Number: 2210016337 000822		
PLAINTIFF'S NAME NICHOLAS DELMONICO		DEFENDANT'S NAME SERENITY SMITH		
PLAINTIFF'S ADDRESS 15501 N. DIAL BOULEVARD APT 2048 SCOTTSDALE AZ 85260		DEFENDANT'S ADDRESS 2645 S. MARSHALL STREET 19148 PHILADELPHIA PA 19148		
PLAINTIFF'S NAME		DEFENDANT'S NAME SERGIO VASSALLO		
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 971 MAPLE DRIVE SOUTHAMPTON PA 18966		
PLAINTIFF'S NAME		DEFENDANT'S NAME RYDER TRUCK RENTAL, INC.		
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 11690 NW 105TH STREET MIAMI FL 33178		
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 10	COMMENCEMENT OF ACTION		
		<input checked="" type="checkbox"/> Complaint	<input type="checkbox"/> Petition Action	<input type="checkbox"/> Notice of Appeal
		<input type="checkbox"/> Writ of Summons	<input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY	COURT PROGRAMS			
<input type="checkbox"/> \$50,000.00 or less	<input type="checkbox"/> Arbitration	<input type="checkbox"/> Mass Tort	<input type="checkbox"/> Commerce	<input type="checkbox"/> Settlement
<input checked="" type="checkbox"/> More than \$50,000.00	<input type="checkbox"/> Jury	<input type="checkbox"/> Savings Action	<input type="checkbox"/> Minor Court Appeal	<input type="checkbox"/> Minors
	<input type="checkbox"/> Non-Jury	<input type="checkbox"/> Petition	<input type="checkbox"/> Statutory Appeals	<input type="checkbox"/> W/D/Survival
	<input type="checkbox"/> Other:			
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT				
STATUTORY BASIS FOR CAUSE OF ACTION				
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)			FILED PRO PROTYPY OCT 10 2022 S. RICE	
			IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>NICHOLAS DELMONICO</u> Papers may be served at the address set forth below.				
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY BRIAN S. CHACKER		ADDRESS 1731 SPRING GARDEN STREET PHILADELPHIA PA 19130		
PHONE NUMBER (215) 567-7955	FAX NUMBER (215) 567-6809			
SUPREME COURT IDENTIFICATION NO. 84284		E-MAIL ADDRESS brian@gayandchacker.com		
SIGNATURE OF FILING ATTORNEY OR PARTY BRIAN CHACKER		DATE SUBMITTED Monday, October 10, 2022, 04:05 pm		

GAY & CHACKER, P.C.
BY: BRIAN S. CHACKER, ESQUIRE
Identification No. 84284
1731 Spring Garden Street
Philadelphia, PA 19130-3893
(215) 567-7955 Fax (215) 567-6809
brian@gayandchacker.com

PROTECHNOTARY
Filed and Attested by the
Office of Judicial Records
10 OCT 2022 04:05 pm
Attorneys for Plaintiff
PHILADELPHIA DISTRICT OF PHILADELPHIA

NICHOLAS DELMONICO
15501 N Dial Boulevard
Apt.2048
Scottsdale, AZ 85260

v.

SERENITY SMITH
2645 S. Marshall Street
Philadelphia, PA 19148
and
SERGIO VASSALLO
971 Maple Drive
Southampton, PA 18966
and
RYDER TRUCK RENTAL, INC.
11690 NW 105TH Street
Miami, FL 33178
and
NORTHEAST METAL TRADERS, INC.
7345 Milnor Street
Philadelphia, PA 19136
and
ABC COMPANY 1
and
RANDY DE-LOSSANTOS
1000 Spruce Street
Apartment 104
Newark, NJ 07108
and
DLS EXPRESS, INC.
143 Huntingdon Terrace
Newark, NJ 07112
and

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

OCTOBER TERM, 2022

NO:

AMAZON.COM, INC.
a/k/a AMAZON.COM, LLC a/k/a
AMAZON LOGISTICS, INC.
c/o Corporation Service Company
2595 Interstate Drive
Suite 103
Harrisburg, PA 17110
and
ABC COMPANY II
and
GEICO CASUALTY COMPANY
5260 Western Avenue
Chevy Chase, MD 20815
Defendants.

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
ONE READING CENTER
PHILADELPHIA, PA 19107
TELEPHONE: (215) 238-1701

AVISO

Le han demandado a usted en la corte. Si usted quiere defendese de estas demandas expuestas las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentarse una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted pueese perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE.
SI NO TIENE ABOGADO O SI NO TIENE EL DINERO
SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O
LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE
ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE
PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACION DE LICENCIADOS DE FILADELPHIA
Servicio De Referencia E Información Legal
One Reading Center
Filadelfia, Pennsylvania 19107
Telephono: (215) 238-1701

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BY: BRIAN S. CHACKER, ESQUIRE
Identification No. 84284
1731 Spring Garden Street
Philadelphia, PA 19130-3893
(215) 567-7955 Fax (215) 567-6809
brian@gayandchacker.com

Attorney for Plaintiff

NICHOLAS DELMONICO
15501 N. Dial Boulevard
Apt 2048
Scottsdale, AZ 85260

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

v.

OCTOBER TERM, 2022

SERENITY SMITH
2645 S. Marshall Street
Philadelphia, PA 19148
and
SERGIO VASSALLO
971 Maple Drive
Southampton, PA 18966
and

NO:

RYDER TRUCK RENTAL, INC.
11690 NW 105TH Street
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NORTHEAST METAL TRADERS, INC.
7345 Milnor Street
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RANDY DÉ-LOSSANTOS
1000 Spruce Street
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AMAZON.COM, INC.
a/k/a AMAZON.COM, LLC a/k/a
AMAZON LOGISTICS, INC.
c/o Corporation Service Company
2595 Interstate Drive
Suite 103
Harrisburg, PA 17110
and
ABC COMPANY II
and
GEICO CASUALTY COMPANY
5260 Western Avenue
Chevy Chase, MD 20815

Defendants.

CIVIL ACTION

1. Plaintiff, Nicholas Delmonico (“Mr. Delmonico”), is an adult individual residing at the above captioned address.
2. Defendant, Serenity Smith (“defendant Smith”), is an adult individual residing at the above address.
3. Defendant, Sergio Vassallo (“defendant Vassallo”), is an adult individual residing at the above address.
4. Defendant, Ryder Truck Rental, Inc. (“defendant Ryder”), is a Florida corporation or other business entity registered to conduct business and conducting business in the Commonwealth of Pennsylvania and Philadelphia as a transportation, logistics and truck rental company with a principal place of business at the above address.
5. Defendant, Northeast Metal Traders, Inc. (“defendant NMT”), is a Pennsylvania corporation or other business entity conducting business as a broker and wholesaler of metal scrap with a principal place of business at the above address.

6. Defendant, ABC Company I, is a corporation or other business entity engaged in the business of trucking and/or transportation whose identity is unknown despite a reasonable investigation.

7. Defendant, Geico Casualty Company (“defendant Geico”), is an insurance company licensed to transact business in the Commonwealth of Pennsylvania and which regularly conducts business in the City and County of Philadelphia, with its headquartered offices located at the above address.

8. At all relevant times, defendant Vassallo operated and controlled a 2019 truck, Indiana license plate 2800912, owned by defendant Ryder and a 2000 Hytracker Manufacturing trailer, Maine license plate 27-6142D, owned by defendant NMT.

9. Upon information and belief, defendant Ryder, defendant NMT and/or defendant ABC Company I partnered with each other to obtain vehicles in which to deliver and perform services on behalf of each other and as a joint venture.

10. At all times relevant hereto, defendant Vassallo, was an agent, servant, worker and/or employee of defendant Ryder, defendant NMT and/or defendant ABC Company I and was acting in the course and scope of his employment, agency and/or authority with these defendants.

11. Defendant, Randy De-Lossantos (“defendant De-Lossantos”), is an adult individual residing at the above address.

12. Defendant, DLS Express, Inc. (“defendant DLS”), is a corporation or other business entity conducting business in the Commonwealth of Pennsylvania and Philadelphia as trucking and transportation company with a place of business at the above address.

13. Defendant, AMAZON.COM, INC. a/k/a AMAZON.COM, LLC a/k/a AMAZON LOGISTICS, INC., (“defendant Amazon”) is a Delaware corporation or other business entity registered to do business and conducting business in the Commonwealth of Pennsylvania and Philadelphia as an online retail, trucking and/or transportation company with a principal place of

business at 410 Terry Avenue North, Seattle, WA 98109 and a registered agent for service of process at the above address.

14. Defendant, ABC Company II, is a corporation or other business entity engaged in the business of trucking and/or transportation whose identity is unknown despite a reasonable investigation.

15. At all relevant times, defendant De-Lossantos operated and controlled a 2014 truck, New Jersey license plate V21929, owned by defendant DLS and a 2018 Hyundai trailer, California license plate HV20243 owned by defendant Amazon.

16. Upon information and belief, defendant DLS, defendant Amazon and/or defendant ABC Company II partnered with each other to obtain vehicles in which to deliver and perform services on behalf of each other and as a joint venture.

17. At all times relevant hereto, defendant De-Lossantos was an agent, servant, worker and/or employee of defendant DLS, defendant Amazon and/or defendant ABC Company II and was acting in the course and scope of his employment, agency and/or authority with these defendants.

18. On or about October 23, 2021, at or about 10:20 a.m., Mr. Delmonico was the owner and operator of a 2015 Audi A-3, New Jersey license plate number A76MAP, traveling northbound on Interstate 95 at or near mile marker 20.7 in Philadelphia, Pennsylvania when his vehicle was struck on the right passenger side by the vehicles operated and controlled by defendant De-Lossantos after De-Lossantos' vehicle was struck by defendant Vassallo's and/or defendant Smith's vehicles, causing Mr. Delmonico to suffer the injuries set forth at length below.

19. This collision resulted solely from the negligence of defendants and was not caused by any act or failure to act on the part of Mr. Delmonico.

COUNT I
Mr. Delmonico v. Defendant Smith

20. Mr. Delmonico incorporates herein by reference paragraphs 1 through 18, inclusive of his complaint as if set forth at length below.

21. The negligence of defendant, Serenity Smith, consisted of the following:

- a. failing to properly operate and control her motor vehicle;
- b. driving inattentively;
- c. failing to safely operate her vehicle in the proper lane of traffic;
- d. driving her vehicle at an excessive speed under the conditions;
- e. failure to have her motor vehicle under such control as to be able to stop with the assured clear distance in the road;
- f. failing to keep a proper lookout ahead;
- g. failing to observe the traffic conditions at Interstate 95, mile marker 20.7, Philadelphia, Pennsylvania.

22. As a result of the aforesaid incident, Mr. Delmonico suffered severe and permanent injuries including, but not limited to, disc protrusion at L5-S1 that displaced the left S1 nerve root, L4-5 bulging disc, neck strain/sprain, left shoulder pain, upper back sprain/strain, right hip pain, lower strain/sprain, and various other ills and injuries.

23. As a direct and proximate result of the conduct of defendant Smith, Mr. Delmonico has suffered and will continue to suffer in the future great pain with mental and physical traumatic anxiety reaction, nervousness and other psychological and emotional disorders depriving Mr. Delmonico of life's pleasures together with great embarrassment and humiliation.

24. As a direct and proximate result of the conduct of defendant Smith, Mr. Delmonico has and will in the future continue to spend large sums of money for medicine and medical care in and about an effort to effect a cure for the aforesaid injuries.

25. As a direct and proximate result of the conduct of defendant Smith, Mr. Delmonico has and will in the future be unable to attend to and perform his daily duties and occupations, all to his great detriment and loss.

26. As a direct and proximate result of the conduct of defendant Smith, Mr. Delmonico has and will in the future be deprived of earnings and earning capacity all to his great financial detriment and loss.

27. As a direct and proximate result of the conduct of defendant Smith, Mr. Delmonico has suffered a loss in the nature of property damage to his vehicle and/or payment of an insurance deductible.

WHEREFORE, Plaintiff, Nicholas Delmonico, demands damages of defendant, Serenity Smith, jointly and severally with the other defendants herein named, in an amount in excess of (\$50,000.00), plus interest, costs, delay damages and any other relief that the Court deems appropriate.

COUNT II
Mr. Delmonico v. Defendant Vassallo

28. Mr. Delmonico incorporates herein by reference paragraphs 1 through 26, inclusive of his complaint as if set forth at length below.

29. The negligence of defendant Vassallo consisted of the following:

- h. failing to properly operate and control his motor vehicles;
- i. driving inattentively;
- j. failing to safely operate his vehicles in the proper lane of traffic;
- k. driving his vehicle at an excessive speed under the conditions;
- l. failing to have his motor vehicle under such control as to be able to stop with the assured clear distance in the road;

- m. failing to keep a proper lookout ahead;
- n. failing to observe the traffic conditions at Interstate 95, mile marker 20.7, Philadelphia, Pennsylvania.

30. As a direct and proximate result of the negligence and carelessness of defendant Vassallo, plaintiff sustained the injuries, damages and expenses as set forth above.

WHEREFORE, Plaintiff, Nicholas Delmonico, demands damages of defendant, Sergio Vassallo, jointly and severally with the other defendants herein named, in an amount in excess of (\$50,000.00), plus interest, costs, delay damages and any other relief that the Court deems appropriate.

COUNT III

Mr. Delmonico v. Defendants Ryder, NMT and ABC Company I

31. Mr. Delmonico incorporates herein by reference paragraphs 1 through 26, inclusive of his complaint as if set forth at length below.

32. The wrongful and negligent acts of defendants Ryder, NMT and ABC Company I, by and through their agents, servants, or employees consisted of, *inter alia*, the following:

- a. Permitting defendant Vassallo to operate his motor vehicles without first ascertaining whether or not he was capable of properly operating said motor vehicles;
- b. Permitting defendant Vassallo to operate his motor vehicle when they knew, or in the existence of due care and diligence should have known that defendant Vassallo was capable of committing the acts of negligence set forth above;
- c. Failing to entrust the operation of said motor vehicles properly;
- d. Failing to entrust the operation of said motor vehicles safely;
- e. Failing to entrust the operation of said motor vehicles reasonably;

- f. Failing to properly maintain and service said motor vehicles;
- g. Failing to routinely maintain and service said motor vehicles;
- h. Failing to safely maintain and service said motor vehicles;
- i. Having their employee/agent/servant failing to be properly qualified as an operator of a motor vehicle of the kind operated by defendant;
- j. Having their employee/agent/servant fail to abide by policies and procedures regarding safe operation and maintenance of said motor vehicles;
- k. Failing to institute and/or enforce policies and procedures regarding safe operation and maintenance of said motor vehicles;
- l. Having their employee/agent/servant fail to abide by policies and procedures regarding safe operation and maintenance of said motor vehicles;
- m. Violating the statutes and ordinances of the Commonwealth of Pennsylvania and the local municipality where the accident occurred pertaining to the operation of a motor vehicle under the circumstances;
- n. Failing to properly equip said motor vehicles with assistive safety devices;
- o. Failing to properly equip said motor vehicles with hands free navigation;
- p. Failing to properly train employee/agent/servant on the proper use of said motor vehicles;
- q. Failing to properly train their employee/agent/servant on the safe use of said motor vehicles;
- r. Failing to routinely test those driving said motor vehicles; and,
- s. Failure to inspect said motor vehicles.

33. Plaintiff further avers that defendants Ryder, NMT and ABC Company I are liable for the negligent, reckless and/or, careless acts of their agent, servant, worker and/or employee, defendant Vassallo, as set forth above and herein under the doctrine of respondent superior.

34. As a direct and proximate result of the negligence and carelessness of defendants Ryder, NMT and ABC Company I, plaintiff sustained the injuries, damages and expenses as set forth above.

WHEREFORE, Plaintiff, Nicholas Delmonico, demands damages of defendants Ryder, NMT and ABC Company I, jointly and severally with the other defendants herein named, in an amount in excess of (\$50,000.00), plus interest, costs, delay damages and any other relief that the Court deems appropriate.

COUNT IV
Mr. Delmonico v. Defendant De-Lossantos

35. Mr. Delmonico incorporates herein by reference paragraphs 1 through 33, inclusive of his complaint as if set forth at length below.

36. The negligence of defendant De-Lossantos consisted of the following:

- o. failing to properly operate and control his motor vehicles;
- p. driving inattentively;
- q. failing to safely operate his vehicles in the proper lane of traffic;
- r. driving his vehicle at an excessive speed under the conditions;
- s. failing to have his motor vehicle under such control as to be able to stop with the assured clear distance in the road;
- t. failing to keep a proper lookout ahead;
- u. failing to observe the traffic conditions at Interstate 95, mile marker 20.7, Philadelphia, Pennsylvania.

37. As a direct and proximate result of the negligence and carelessness of defendant De-Lossantos, plaintiff sustained the injuries, damages and expenses as set forth above.

WHEREFORE, Plaintiff, Nicholas Delmonico, demands damages of defendant, Randy De-Lossantos, jointly and severally with the other defendants herein named, in an amount in excess of (\$50,000.00), plus interest, costs, delay damages and any other relief that the Court deems appropriate.

COUNT V

Mr. Delmonico v. Defendants DLS, Amazon and ABC Company II

38. Mr. Delmonico incorporates herein by reference paragraphs 1 through 36,

inclusive of his complaint as if set forth at length below.

39. The wrongful and negligent acts of defendants DLS, Amazon and ABC Company II, by and through their agents, servants, or employees consisted of, *inter alia*, the following:

- a. Permitting defendant De-Lossantos to operate his motor vehicles without first ascertaining whether or not he was capable of properly operating said motor vehicles;
- b. Permitting defendant De-Lossantos to operate his motor vehicle when they knew, or in the existence of due care and diligence should have known that defendant De-Lossantos was capable of committing the acts of negligence set forth above;
- c. Failing to entrust the operation of said motor vehicles properly;
- d. Failing to entrust the operation of said motor vehicles safely;
- e. Failing to entrust the operation of said motor vehicles reasonably;
- f. Failing to properly maintain and service said motor vehicles;
- g. Failing to routinely maintain and service said motor vehicles;
- h. Failing to safely maintain and service said motor vehicles;
- i. Having their employee/agent/servant failing to be properly qualified as an operator of a motor vehicle of the kind operated by defendant;

- j. Having their employee/agent/servant fail to abide by policies and procedures regarding safe operation and maintenance of said motor vehicles;
- k. Failing to institute and/or enforce policies and procedures regarding safe operation and maintenance of said motor vehicles;
- l. Having their employee/agent/servant fail to abide by policies and procedures regarding safe operation and maintenance of said motor vehicles;
- m. Violating the statutes and ordinances of the Commonwealth of Pennsylvania and the local municipality where the accident occurred pertaining to the operation of a motor vehicle under the circumstances;
- n. Failing to properly equip said motor vehicles with assistive safety devices;
- o. Failing to properly equip said motor vehicles with hands free navigation;
- p. Failing to properly train employee/agent/servant on the proper use of said motor vehicles;
- q. Failing to properly train their employee/agent/servant on the safe use of said motor vehicles;
- r. Failing to routinely test those driving said motor vehicles; and,
- s. Failure to inspect said motor vehicles.

40. Plaintiff further avers that defendants DLS, Amazon and ABC Company II are liable for the negligent, reckless and/or, careless acts of their agent, servant, worker and/or employee, defendant De-Lossantos, as set forth above and herein under the doctrine of respondent superior.

41. As a direct and proximate result of the negligence and carelessness of defendants, plaintiff sustained the injuries, damages and expenses as set forth above.

WHEREFORE, Plaintiff, Nicholas Delmonico, demands damages of defendants DLS, Amazon and ABC Company II, jointly and severally with the other defendants herein named, in an

amount in excess of (\$50,000.00), plus interest, costs, delay damages and any other relief that the Court deems appropriate.

COUNT VI
Mr. Delmonico v. Geico

42. Mr. Delmonico incorporates herein by reference paragraphs 1 through 41, inclusive of his complaint as if set forth at length below.

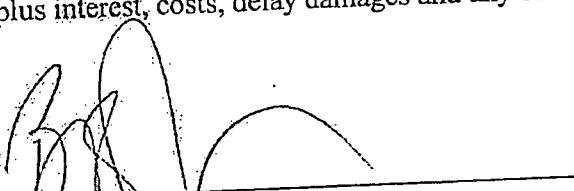
43. At all times material hereto, the Plaintiff was the owner and operator of a motor vehicle which was covered by a policy of insurance issued by defendant Geico, policy number 4615476324, which included coverage for uninsured and underinsured motorist coverage applicable to Mr. Delmonico.

44. Upon information and belief, the above tortfeasors were uninsured or underinsured at the time of the collision.

45. By letter dated October 4, 2022, plaintiff's counsel wrote to defendant Geico, advising of his intention to proceed under the uninsured/underinsured motorist provision of the automobile insurance policy number 4615476324 in effect on the date of the accident, (See Letter to defendant Geico dated October 4, 2022 attached hereto and marked as Exhibit "A").

46. Accordingly, Mr. Delmonico asserts a claim for uninsured and underinsured benefits against defendant Geico.

WHEREFORE, Plaintiff, Nicholas Delmonico, demands damages of defendant Geico in an amount in excess of (\$50,000.00), plus interest, costs, delay damages and any other relief that the Court deems appropriate.



BRIAN S. CHACKER, ESQUIRE
GAY & CHACKER, P.C.
1731 Spring Garden Street
Philadelphia, PA 19130
(215) 567-7955
brian@gayandchacker.com

Attorneys for Plaintiff
Nicholas Delmonico

Date: 10/14/22

EXHIBIT“A”



EDWARD F. CHACKER*
BRIAN S. CHACKER**
ANDREA KUSSELSON*
JAMES A. WELLS **
MAUREEN A. CHACKER***^

CENTER CITY OFFICE
1731 Spring Garden Street
Philadelphia, PA. 19130-3915
(215) 567-7955 FAX (215) 567-6809

* Member PA Bar Only
** Member PA & NJ. Bars
^ Of Counsel

October 4, 2022

VIA CERTIFIED MAIL

Geico
Regions 1 Claims
P.O. Box 9505
Fredericksburg, VA 22403-9505
Attn: Victoria Smith, Claim Department

Re:	Our Client:	Nick Delmonico
	File #	216594
	Claim #	0674640100000002
	Date of Incident:	10/23/2020

Dear Ms. Smith:

As you are aware this office was retained to represent the above named individual in a claim for personal injuries sustained as a result of an accident occurring on October 23, 2020.

Please be advised that I will be submitting an Underinsured/Uninsured Motorist Claim on behalf of our client in this matter. If there are any forms necessary in order to document our client's claim for Underinsured/Uninsured Motorist Benefits please forward same to my attention accordingly.

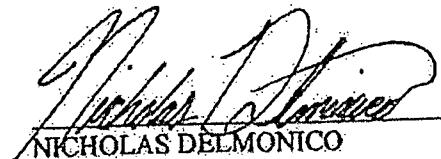
Very truly yours,

/ Brian S. Chacker
Brian S. Chacker, Esquire

CERTIFIED MAIL # 7021-0350-0001-7075-3120
RETURN RECEIPT REQUESTED

VERIFICATION

I, Nicholas Delmonico, state that I am the Plaintiff in this action and hereby verify that the statements made in the foregoing Pleading are true and correct to the best of my knowledge, information and belief. I understand that the statements therein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsifications to authorities.



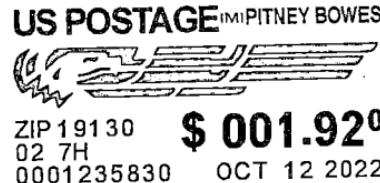
NICHOLAS DELMONICO

COMPLETE LIST OF DEFENDANTS:

1. SERENITY SMITH
2645 S. MARSHALL STREET 19148
PHILADELPHIA PA 19148
2. SERGIO VASSALLO
971 MAPLE DRIVE
SOUTHHAMPTON PA 18966
3. RYDER TRUCK RENTAL, INC.
11690 NW 105TH STREET
MIAMI FL 33178
4. NORTHEAST METAL TRADERS, INC.
7345 MILNOR STREET
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6. RANDY DE-LOSSANTOS
1000 SPRUCE STREET APARTMENT 104
NEWARK NJ 07108
7. DLS EXPRESS, INC.
143 HUNTINGDON TERRACE
NEWARK NJ 07112
8. AMAZON .COM, INC.
ALIAS: C/O CORPORATION SERVICES COMPANY
2595 INTERSTATE DRIVE SUITE 103
HARRISBURG PA 17110
9. ABC COMPANY II
0000
PHILADELPHIA PA 17110
10. GEICO CASUALTY COMPANY
5260 WESTERN AVENUE
CHEVY CHASE MD 20815



FIRST-CLASS



Amazon.Com, Inc.
a/k/a Amazon.Com, LLC aka
Amazon Logistics, Inc.
c/o Corporation Services Company
2595 Interstate Drive
Suite 103
Harrisburg, Pa. 17110